

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

BESTJACKPOTS.COM, LLC and)
THIRD EYE MEDIA PRODUCTION CO., INC.,)
Plaintiffs,)
vs.) Cause No.
HARTFORD CASUALTY INSURANCE)
COMPANY,) JURY TRIAL DEMANDED
Defendant.)

NOTICE OF REMOVAL

COMES NOW Defendant Hartford Casualty Insurnace Company (“Hartford”), misnamed The Hartford Casualty Company in Plaintiffs’ Petition, and by and through counsel, and for its Notice of Removal of the Plaintiff’s cause of action to this Court from the City of St. Louis Circuit Court, states as follows:

1. Plaintiff’s initial petition was filed in the Circuit Court of the City of St. Louis, Missouri, on or about October 14, 2009. That petition with all attachments is attached hereto as “Exhibit A” and also constitutes the entire certified State Court file.
2. No summons or petition has been served on Hartford. However, Hartford desires to waive service of process as of this date, November 13, 2009, for the purpose of removing this cause.
3. The petition alleges bad faith refusal to defend, bad faith refusal to settle, and breach of fiduciary duty.
4. Although the petition alleges damages in excess of \$25,000, Plaintiffs have demanded in excess of One Million Dollars (\$1,000,000.00) in this matter.
5. Removal of an action from state court to federal court is proper if none of the parties

in interest joined and served as defendants is a citizen of the state in which such action is brought. 28 U.S.C. §1441(b).

6. Hartford is a citizen of the State of Indiana. Its principle place of business is in Hartford, Connecticut.

7. Upon information and belief, Plaintiff Bestjackpots.com is a Michigan corporation. Plaintiff Third Eye Media Production Company, Inc. is a Missouri Corporation.

8. Further, the District Courts of the United States shall have original jurisdiction of all civil actions wherein the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs, and the cause of action is between citizens of two separate states. 28 U.S.C. §1332(a).

9. The amount in controversy exceeds the \$75,000.00 jurisdictional limits.

10. Therefore, complete diversity exists between all of the parties involved in this case, and the amount in controversy exceeds the required jurisdictional limits thereby making Plaintiff's cause of action removable to this court.

WHEREFORE, Defendant Hartford respectfully requests this Court to remove Plaintiff's Petition for Damages to the United States District Court for the Eastern District of Missouri, Eastern Division.

/S/ Scott C. Harper

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CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2009, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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